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December 12, 2022

Hon. Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

**Re:** *Skillman v. The Laundress, LLC*, Case No. 1:22-cv-10008-JMF

Dear Judge Furman:

I am counsel to defendant The Laundress, LLC (“The Laundress” or “Defendant”) in the above-referenced case and write with the consent and agreement of counsel for plaintiff Meaghan Skillman (“Plaintiff”) to respectfully request an extension of time for Defendant to answer, move, or otherwise respond to the complaint.

Service was effectuated on the Defendant on November 29, 2022. Defendant’s deadline to answer or otherwise respond to the Complaint is December 20, 2022. Defendant seeks an extension of the deadline to answer or otherwise plead until 30 days after the filing of a consolidated amended complaint as detailed below. This is the first request for an extension of any deadline in this case. Pursuant to a Notice dated November 28, 2022, the Court scheduled an Initial Pretrial Conference for March 2, 2023 (ECF No. 5).

Plaintiff Meaghan Skillman, through her counsel, initiated the above-captioned litigation on November 23, 2022. Ms. Skillman’s Complaint contains allegations relating to possible bacterial contamination in certain of Defendant’s cleaning and laundry products. Ms. Skillman purports to seek relief on behalf of herself and a nationwide class of plaintiffs. To date, one other purported class action complaint has been filed with substantially similar allegations. *See Murphy v. Unilever United States Inc.*, No. 1:22-cv-7468 (N.D. Cal). Plaintiff’s counsel has represented that it currently intends to file additional cases, possibly in New York and California.

Due to the inherent overlap of the various cases, and to achieve judicial economy and to preserve the parties’ resources, counsel for Defendant have engaged in productive discussions with the respective plaintiffs’ counsel in each case regarding issues of consolidation and coordination. Counsel for plaintiffs are conferring regarding their plans for consolidating the cases and filing a consolidated amended complaint. To provide for sufficient time to do so, Defendant respectfully requests that this Court extend the time for Defendant to answer or otherwise plead to 30 days from the date on which the plaintiffs file a



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consolidated amended complaint. This modest extension will allow the parties to resolve the questions of consolidation and allow for the most efficient and streamlined resolution of this case.

Respectfully submitted,

*/s/ Ronald Rothstein*

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CC: Counsel of record for Plaintiff